

REMARKS

Claims 1 – 19 are pending in the application and stand rejected.

Rejection under 35 U.S.C §112

Claim 9 stands rejected under 35 U.S.C. 112 as being indefinite for reciting “the related reliability indicator.” Applicants respectfully disagree, and note that claim 9 depends from claim 8, which recites that the received location data includes a reliability indicator which the location server uses to determine whether or not to overwrite existing location data. Applicants thus submit that it clear and definite that “the related reliability indicator” in claim 9 refers to the reliability indicator included in the received location data as recited in claim 8 and that no other interpretation is possible, and respectfully request the Examiner to kindly reconsider and withdraw this rejection.

Rejection under 35 U.S.C §103

Claims 1-19 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Pat. No. 6,748,426 to Shaffer et al. in view of U.S. Pat. No. 6,738,841 to Wolff. In particular, the Examiner finds that Shaffer teaches a memory, a network interface, and a location server all having the claimed attributes at, according to the Examiner, column 5, line 31 to column 6, line 2. The Examiner admits that Shaffer does not teach a wireless interface for receiving data, but further finds that Wolff teaches a wireless interface and a location server, as claimed, at column 8, lines 48-68. The Examiner finally opines that it would have been obvious to the skilled person to combine Shaffer and Wolff because using a wireless link to a printer gives a user the mobility to print data in any area that the printer and/or printer server can accommodate.

Applicants have reviewed the references with care, paying particular attention to the passages cited to by the Examiner, and are compelled to disagree with the Examiner’s understanding of these references. Contrary to the Examiner’s understanding, Shaffer does not in fact teach a hard-copy output device comprising a location server for receiving and storing location data in the memory and for responding to client requests received via the network

interface to return location information comprising, or derived from, the location data stored in memory. The disclosure at column 5, line 31 to column 6, line 2 of Shaffer that is cited by the Examiner discusses a "Linkage Key" which "is a data value used to associate in real-time information located in multiple databases or network nodes" and can be "DPC, ZIP+4, State-county/census tract/census block, coordinate interleaved pair (lat/lon) or quad-tree, 10-digit telephone number, standardized street address, standardized street address plus a standardized name, 10-digit telephone number plus standardized name, sequentially assigned number, and the like." This portion further discusses a client computer sending a client's current location and receiving, through the Linkage Key and a Linkage Mechanism, information regarding the client's current location (such as near-by stores).

As most easily understood with reference to Fig. 2 of Shaffer, the system of Shaffer "includes a Linkage Key application server 30, a United States Postal Service address translation server 32, a map server 34, a web server 36, an ACD server 38 and a voice recognition server 40." Col. 11, ll. 33-37. All of these components are required to provide the functionality of Shaffer, and not one of them is a hard-copy output device. Furthermore, not one of them offers, by itself, the claimed functionality of the present invention, i.e. receiving and storing location data in the memory and responding to client requests received via the network interface to return location information comprising, or derived from, the location data stored in memory. In Shaffer, location data is stored over several components – the map server and ACD server at a minimum. Client requests are responded to by the web server. Location information is derived from "local and external databases" (col. 11 l. 44) by the Linkage Key application server. And again, there is no hard-copy output device. Applicants thus respectfully disagree with the Examiner's characterization of Shaffer.

As for Wolff, Applicants respectfully disagree with the Examiner's opinion that the skilled person would be motivated to attempt to combine it with Shaffer and, even more importantly, that doing so would result in anything akin to the claimed invention. Wolff teaches connecting a printer to a network. Thus, applying the teaching of Wolff to Shaffer would only result in yet one more component, a printer, being added to the system of Shaffer. There is nothing in Shaffer or Wolff that would motivate the skilled person to endow the printer of Wolff with a location server for receiving and storing location data in the memory and for responding

to client requests received via the network interface to return location information comprising, or derived from, the location data stored in memory. Why do so when the system already includes a Linkage Key application server, a United States Postal Service address translation server, a map server, a web server, an ACD server and a voice recognition server?

In view of the above, Applicants respectfully submit that the asserted combination of Shaffer and Wolff is not only one that would have been contemplated by the skilled person but would not anticipate the presently claimed invention regardless, and ask the Examiner to kindly reconsider and pass all claims to issue.

Regarding the prior art made of record by the Examiner but not relied upon, Applicants believe that this art does not render the pending claims unpatentable.

In view of the above, Applicants submit that the application is now in condition for allowance and respectfully urge the Examiner to pass this case to issue.

The Commissioner is authorized to charge any additional fees which may be required or credit overpayment to deposit account no. 08-2025. In particular, if this response is not timely filed, the Commissioner is authorized to treat this response as including a petition to extend the time period pursuant to 37 CFR 1.136(a) requesting an extension of time of the number of months necessary to make this response timely filed and the petition fee due in connection therewith may be charged to deposit account no. 08-2025.

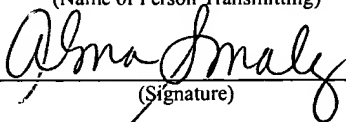
I hereby certify that this correspondence is being deposited with the United States Post Service with sufficient postage as first class mail in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on

March 16, 2006

(Date of Transmission)

Alma Smalling

(Name of Person Transmitting)

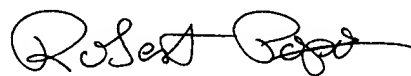


(Signature)

3/16/06

(Date)

Respectfully submitted,



Robert Popa

Attorney for Applicants

Reg. No. 43,010

LADAS & PARRY

5670 Wilshire Boulevard, Suite 2100

Los Angeles, California 90036

(323) 934-2300 voice

(323) 934-0202 facsimile

rpopa@ladasparry.com